

FACILITY-ASSESSMENT SURVEY

This guidebook presents a comprehensive overview of environmental regulations applicable to Michigan fruit and vegetable processors. Although the guide may appear overwhelming, you only need to review those chapters that apply to your facility. We encourage you to take the time to look at every chapter but realize this may not be a reasonable expectation. To tailor the guide to benefit your specific operation, we have included the Facility-Assessment Survey. The survey asks a series of questions through which the answers will lead you to specific chapters you need to read.

To complete the Facility-Assessment Survey, simply answer the questions on the following pages, “yes” or “no”. Depending on how you answer a particular question, you may be referred to a chapter of the guidebook that applies to your operation. Some chapters apply to all processors and are phrased as such. The Facility-Assessment Survey is an effective navigational tool that can be referenced whenever necessary. Take the time to refer back to these questions as your operations change or new questions arise.

Chapter 1: Air Quality Regulations

- | | | |
|---|---|---|
| 1. Do you have, or intend to install, equipment or processes that generate air pollution? (<i>e.g., boiler, solvent degreaser, dryers, material storage piles, etc.</i>) | <input type="checkbox"/> Yes
1.2.1 | <input type="checkbox"/> No
continue |
| 2. Do any of your processes emit particulate matter (dust, soot or ash)? | <input type="checkbox"/> Yes
1.3.2 | <input type="checkbox"/> No
continue |
| 3. Do you open-burn any waste? | <input type="checkbox"/> Yes
1.3.3 | <input type="checkbox"/> No
continue |
| 4. Do any of your processes emit volatile organic compounds (VOCs)? | <input type="checkbox"/> Yes
1.5 & 1.6 | <input type="checkbox"/> No
continue |
| 5. Are you interested in learning about the benefits to be gained through environmental stewardship? | <input type="checkbox"/> Yes
1.11 | <input type="checkbox"/> No
continue |
| 6. Are you renovating or demolishing a building? | <input type="checkbox"/> Yes
1.16.6 | <input type="checkbox"/> No
continue |
| 7. Is your facility subject to a federal New Source Performance Standard (NSPS)? (see Appendix 1-C for a listing of source categories subject to a NSPS) | <input type="checkbox"/> Yes
1.17 | <input type="checkbox"/> No
continue |
| 8. Do you use or store any substance regulated under Section 112(r) of the Clean Air Act (CAA) such as anhydrous ammonia or a chlorine-based substance? (<i>CAA Section 112(r) substances are defined in Appendix B.</i>) | <input type="checkbox"/> Yes
1.20 | <input type="checkbox"/> No
continue |
| 9. Do you have equipment or processes that utilize chlorofluorocarbons (CFCs) as a refrigerant? (<i>e.g., refrigeration units and air conditioners</i>) | <input type="checkbox"/> Yes
1.21 | <input type="checkbox"/> No
continue |
| 10. Do you store or process consumable products or create waste streams from these activities that is a mixture of organic and inorganic materials that can generate mal odors at your facility? | <input type="checkbox"/> Yes
1.8 | <input type="checkbox"/> No
continue |

Chapter 2: Waste Management

11. Every facility generates solid waste (*e.g. garbage, rubbish, yard wastes, etc.*); therefore, it is important that you are aware of the disposal requirements and options. It is recommended that you read Chapter 2.2 ☒ Read 2.2
12. Do you open-burn any wastes? ☐ Yes 2.2.1 ☐ No continue
13. Do you store scrap tires on your property? ☐ Yes 2.2.2 ☐ No continue
14. Do you generate liquid industrial waste at your facility? (*Liquid industrial waste is waste that is not regulated as a hazardous waste and includes industrial wastewater, used oil that is being recycled, sewer clean-out residue, grease trap clean-out residue, and other liquid wastes.*) ☐ Yes 2.3 ☐ No continue
15. Do you know or suspect you may be generating hazardous waste at your facility? (*Hazardous waste is defined in Chapter 2.4.1.*) ☐ Yes 2.4 ☐ No continue
16. Do you generate any universal waste at your facility? (*Universal waste includes electric lamps [fluorescent, sodium vapor, mercury vapor, neon and incandescent], computer monitors, television tubes, batteries, and some pesticides.*) ☐ Yes 2.4.1.c ☐ No continue
17. Do you have or dispose of any of the following materials at your facility?
- Used oil..... ☐ Yes 2.4.9.a ☐ No continue
 - Used oil filters..... ☐ Yes 2.4.9.b ☐ No continue
 - Lead acid batteries..... ☐ Yes 2.4.9.c ☐ No continue
 - Dry cell batteries..... ☐ Yes 2.4.9.d ☐ No continue
 - Fluorescent lamps or other lights..... ☐ Yes 2.4.9.e ☐ No continue
 - Small capacitors and ballasts..... ☐ Yes 2.4.9.f ☐ No continue
 - Sorbents..... ☐ Yes 2.4.9.g ☐ No continue
 - Shop towels and other textiles..... ☐ Yes 2.4.9.h ☐ No continue
 - Spent parts washer solvent or other solvents..... ☐ Yes 2.4.9.i ☐ No continue
 - Aerosols..... ☐ Yes 2.4.9.j ☐ No continue
 - Painting wastes..... ☐ Yes 2.4.9.k ☐ No continue
 - Wastes containing silver (e.g. photo processing waste)..... ☐ Yes 2.4.9.l ☐ No continue
 - Electronic waste..... ☐ Yes 2.4.9.m ☐ No continue
 - Waste containing radioactive materials..... ☐ Yes 2.4.9.n ☐ No continue
18. Do you know how to select a qualified company to transport your hazardous waste and/or dispose of it? ☐ Yes continue ☐ No 2.4.10
19. Does your facility generate medical waste? (*e.g., are you a pharmaceutical company, research facility that manufactures drugs or vaccines, medical equipment manufacturer with testing programs, large company with in-house health care facilities, etc.?*) ☐ Yes 2.5 ☐ No continue

FACILITY ASSESSMENT

Chapter 3: Wastewater

20. It is important for you to be aware of what type of wastewater is discharged from your facility, how it is treated and which regulatory program regulates it. It is recommended that you read Chapter 3.1. ☒ Read 3.1
21. Is your wastewater discharged to a publicly owned treatment works facility? ☐ Yes 3.2.1 ☐ No continue
22. Do you employ a hazardous or liquid industrial waste transporter to dispose of wastewater generated at your facility? ☐ Yes 3.2.2 ☐ No continue
23. Is any wastewater discharged into surface waters? *(Includes direct discharge to a lake, stream, river, or drain, and indirect discharges via a storm sewer or ditch.)* ☐ Yes 3.2.3 ☐ No continue
24. Is any wastewater discharged into the ground or groundwater? *(Includes seepage lagoons, septic tanks/tile field systems, and irrigation systems.)* ☐ Yes 3.2.4 ☐ No continue
25. Is wastewater (i.e. reverse osmosis reject, brine or greywater) injected into a deep injection well? ☐ Yes 3.2.5 ☐ No continue
26. Do you discharge wastewater to any sewer system or into the waters of the state? ☐ Yes 3.4 ☐ No continue
27. Do you have a wastewater treatment system on-site? ☐ Yes 3.5 ☐ No continue
28. Are you considering an upgrade of your current wastewater system, or interested in learning more about wastewater treatment processes. ☐ Yes 3.6 ☐ No continue

Chapter 4: Material Storage and Transportation

*There are a number of terms defined in Appendix B that are key to your understanding of the regulations and their applicability to your operation. It is recommended that you make yourself familiar with these terms before continuing. These defined terms appear in bold lettering. Please note, in some instances, multiple agencies use the same term to describe a regulated group of material; however, its definition differs. Such terms are identified in bold face type followed by a dash and the acronym of the defining agency or regulation (e.g., "**hazardous waste-DEQ**", "**hazardous waste-EPA**"). As you answer the questions pertaining to this chapter, refer back to the definitions.*

29. Do you store any of the following: **flammable & combustible liquids-Act 207**, **flammable & combustible liquids-MIOSHA**, **highly hazardous chemicals**, **hazardous material-Act 207**, **hazardous substances-CERCLA**, **hazardous waste-DEQ**, **hazardous waste-EPA**, **oil-DEQ**, **oil-EPA**, **salt**, ? *(Definitions for the bolded terms are listed in Appendix B.)* ☐ Yes 4.1 ☐ No continue
30. Do you store or use **polluting materials**? ☐ Yes 4.2 ☐ No continue
31. Does your facility have, or intend to install, an underground storage tank system? ☐ Yes 4.3.1 ☐ No continue

- | | | |
|---|---------------------------------------|---|
| 32. Does your facility have, or intend to install, an <u>aboveground</u> storage tank system to store flammable and combustible liquids with a flashpoint of less than 200°F? | <input type="checkbox"/> Yes
4.3.2 | <input type="checkbox"/> No
continue |
| 33. Does your facility have, or intend to install, an <u>aboveground</u> storage tank system that contains flammable compressed gas or liquefied petroleum gas? | <input type="checkbox"/> Yes
4.3.2 | <input type="checkbox"/> No
continue |
| 34. Do you transport any hazardous material-USDOT , as defined by the U.S. Department of Transportation? | <input type="checkbox"/> Yes
4.4 | <input type="checkbox"/> No
continue |
| 35. Do you store, use, or transport any polychlorinated biphenyls (PCBs) at your facility? | <input type="checkbox"/> Yes
4.5 | <input type="checkbox"/> No
continue |

Chapter 5: SARA Title III & Community Right-to-Know Act

All bolded terms are defined in Appendix B of this guidebook. It is recommended that you make yourself familiar with these terms before continuing.

- | | | |
|---|-------------------------------------|---|
| 36. Does your facility store or use extremely hazardous substances ? | <input type="checkbox"/> Yes
5.2 | <input type="checkbox"/> No
continue |
| 37. Does your facility store or use extremely hazardous substances or hazardous substances-CERCLA ? | <input type="checkbox"/> Yes
5.3 | <input type="checkbox"/> No
continue |
| 38. Does your facility store more than 500 pounds (approx. 55 gallons) of extremely hazardous substances (EHSs) or any amount that is in excess of its threshold quantity? <i>(EHSs are defined in Appendix B. Threshold quantities are identified in the List of Lists, which can be accessed at www.michigan.gov/deqsara.)</i> | <input type="checkbox"/> Yes
5.4 | <input type="checkbox"/> No
continue |
| 39. Is your facility a retail gas station that stores 75,000 or more gallons of gasoline or 100,000 or more gallons of diesel fuel in underground storage tanks? | <input type="checkbox"/> Yes
5.4 | <input type="checkbox"/> No
continue |
| 40. Does your facility store 10,000 or more pounds of hazardous chemicals-OSHA at your facility? <i>(Includes any material that is required to have an MSDS; see definition in Appendix B.)</i> | <input type="checkbox"/> Yes
5.4 | <input type="checkbox"/> No
continue |
| 41. Does your facility use, manufacture, or process any toxic chemical in an amount greater than its threshold quantity? <i>(Toxic chemical is defined in Appendix B. Threshold quantities are identified in the List of Lists, which can be accessed at www.michigan.gov/deqsara.)</i> | <input type="checkbox"/> Yes
5.5 | <input type="checkbox"/> No
continue |

Chapter 6: Environmental Emergencies

All bolded terms are defined in Appendix B of this guidebook. It is recommended that you make yourself familiar with these terms before continuing.

42. Does your facility store, use, or generate any of the materials defined in Appendix B? ☐ Yes 6.1 ☐ No continue
43. Do you generate any **hazardous waste-DEQ**? ☐ Yes 6.2.1 ☐ No continue
44. Do you store or use any of the following polluting materials at thresholds listed:
• **salt** = 5 tons solid form or 1,000 gallons liquid form?
• other **polluting materials** = 440 pounds outdoors or 2,200 pounds indoors
• **oil-DEQ** = 660 gallon storage tank capacity or 1,320 gallon total above ground storage capacity ☐ Yes 6.2.2 ☐ No continue
45. Does the storage capability for **oil-EPA** or petroleum products exceed any of the following capacities at your facility:
• 1,320 gallons for all aboveground storage?
• 42,000 gallons for all underground storage?
and
• Could a release potentially reach navigable waters or adjoining shorelines? ☐ Yes 6.2.3 ☐ No continue
46. Is your facility required to have a storm water permit for the discharge of storm water associated with a manufacturing activity? ☐ Yes 6.2.4 ☐ No continue
47. Does your facility handle, use, or store any **CAA Section 112(r) substances (i.e. ammonia, anhydrous ammonia or chlorine)**, at or above the listed threshold quantity? (CAA Section 112(r) substances are defined in Appendix B. Threshold quantities are identified in the List of Lists, which can be accessed at www.michigan.gov/deqsara.) ☐ Yes 6.2.5 ☐ No continue
48. Does your facility have flammable and combustible liquids on site in above ground containers? ☐ Yes 6.2.6 ☐ No continue
49. Do you transport **hazardous material-USDOT**? ☐ Yes 6.2.7 ☐ No continue
50. Chapter 6.3 pertains to release notification requirements. It is recommended that you become familiar with the Release Notification Requirements Table so that you will be prepared should there be a spill or release at your facility ☒ Read 6.3
51. Chapter 6.4 pertains to release response and cleanup criteria. It is recommended that you read this chapter if you have a release or spill at your facility. ☒ Read 6.4

Chapter 7: Sites of Environmental Contamination, Property Transfers, and Liability Issues

52. Do you own or operate property that you know or suspect is contaminated? ☐ Yes 7.2 ☐ No continue
53. Are you considering purchasing property or moving your business to a new location? ☐ Yes 7.3 ☐ No continue

Chapter 8: Activities at or Near the Land/Water Interface

54. Are you conducting any earth change activities (construction) on a site over 1 acre in size or within 500 feet of a river, lake or stream? ☐ Yes Page 8-2 & 3.2.3.b ☐ No continue
55. Are you involved in any of the following activities taking place within a 100-year floodplain of a river, stream, drain, or lake: construction, filling, or changing the grade? ☐ Yes 8.2 ☐ No continue
56. Are you involved in any of the following activities taking place below the ordinary high-water mark of an inland lake or stream: dredging or filling, construction or modification of a structure on bottomland, operation of a marina, structurally interfering with the natural flow of the lake or stream, or enlarging or diminishing the area of the lake or stream? ☐ Yes 8.3 ☐ No continue
57. Are you involved in any of the following activities taking place in a wetland: depositing fill material, removing soil, draining surface water, or conducting development? (*Wetland is defined on page 8-4.*) ☐ Yes 8.4 ☐ No continue
58. Are you involved in any of the following activities taking place in a "Designated Environmental Area": dredging, filling, grading, or altering the soil; altering natural drainage; altering vegetation; or conducting construction? (*Designated Environmental Areas are listed on page 8-4.*) ☐ Yes 8.5 ☐ No continue
59. Are you conducting any development activities in a "Critical Dune Area"? (*Critical Dune Areas are listed on page 8-5.*) ☐ Yes 8.6 ☐ No continue

Chapter 9: Drinking Water

60. Do you provide service for to not less than 15 service connections or serve not less than 25 individuals on an average daily basis not less than 60 days out of the year? This could be the case if you have your own water supply, such as a well. ☐ Yes 9.2 ☐ No continue
61. Does your facility have capacity to make a water withdrawal of at least 100,000 gallons/day averaged over a 30 day period (roughly a 70 gallon/minute pump)? ☐ Yes 9.2.5 ☐ No continue
62. Since all food processors have a water supply for their employees/customers (*e.g., drinking fountains, sinks, showers, etc.*), it is recommended that you read Section 9.4 to learn about cross connections. ☒ Read 9.4

Chapter 10: Cost Effective Compliance and Pollution Prevention Techniques

63. Pollution prevention (P2) techniques may help cut costs, and in some instances, allows a company to drop below regulatory thresholds and thereby become free of certain regulatory requirements. This chapter discusses benefits, tools and opportunities common to the P2 approach. ☒ Read Chapter 10
64. Do you know what pollution prevention is? ☐ Yes continue ☐ No 10.1.1
65. Do you know how to implement a pollution prevention plan? ☐ Yes continue ☐ No 10.1.4
66. Are you interested in learning how to increase efficiency and reduce waste in all aspects of your business? ☐ Yes 10.1.5 ☐ No continue
67. Are you aware of what an environmental management system (EMS) is and what it can do for your business? (*This section includes a discussion of Eco-Efficient Systems for economic and environmental management. There is also a self-assessment tool to help identify pollution prevention and waste minimization opportunities.*) ☐ Yes continue ☐ No 10.2 & 10.3